

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re:

IDEAL PROPERTY INVESTMENTS LLC,  
  
Debtor.

CASE NO. 24-01421-11

DECLARATION OF ERIC CAMM IN  
SUPPORT OF FIRST DAY MOTIONS

ERIC CAMM hereby declares as follows:

1. I am the Manager of the debtor. I am also the Director of Capital Advisory of TurningPointe, LLC d/b/a Turning Point Strategic Advisors, the previously appointed general receiver over Creative Technologies, L.L.C. ("Creative") and Ideal Property Investments, LLC ("Debtor"). I am over the age of 18, and I am competent to testify. This declaration is based on my personal knowledge and my review of documents produced by Ryan Wear, Debtor's previous Manager and principal actor, records provided by third parties as described below, and discussions with the Debtor's brokers, former employees of Debtor and its affiliates.

**GENERAL OVERVIEW OF DEBTOR, ITS ASSETS AND ITS SECURED CREDITORS**

2. The Debtor is the holder of approximately twenty-five parcels of real property ("Real Property"). Of note, at the inception of the receivership, Mr. Wear did not disclose all of

DECLARATION OF ERIC CAMM IN SUPPORT OF  
FIRST DAY MOTIONS - 1

**DBS | LAW**

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1 these parcels and I and the team at Turning Point have been discovering additional ones through  
2 our efforts as Receiver, which pre-date this filing. Additionally, several parcels are owned by  
3 wholly owned subsidiaries of the Debtor. Finally, a review of the Debtor's records has indicated  
4 that up to an additional sixteen parcels might be owned by Debtor or its subsidiaries (or have  
5 been recently transferred by them), which my team is in the process of investigating. Attached as  
6 Exhibit A is a spreadsheet identifying the Real Property, its address, its estimated value, and all  
7 known secured creditors for such Real Property and the amounts believed to be owed to each.  
8 This spreadsheet also identifies whether the Debtor or one of its subsidiaries is in title to the  
9 respective Real Property.  
10

11 3. Many of the Real Properties have commercial tenants. Some of these tenants pay  
12 rent while others are affiliated entities that have commercial leases with Debtor but who do not  
13 appear to have ever paid rent. This includes entities in their own involuntary bankruptcy  
14 proceedings in Texas (explained further below). Attached as Exhibit B is a copy of rent rolls for  
15 the Real Property identifying the anticipated income for the Debtor during this proceeding. It is  
16 anticipated that the Debtor will shortly file one or more motions to approve the sale of certain  
17 properties in order to generate additional cash, which will be addressed at or before the Final  
18 Hearing.  
19

20 4. The Debtor has put together a proposed budget ("Budget") for the first six weeks  
21 of this proceeding, which is attached as Exhibit C.  
22

23 5. The Debtor is investigating the status of insurance at the various Real Properties.  
24 However, it is known that, presumably due to cash flow issues and delays in receiving  
25 information from Mr. Wear, certain insurance policies lapsed and the secured lenders for such  
26 parcels have obtained force placed insurance. The Debtor is actively working with an insurance

1 broker to replace all lapsed insurance policies, which will be one uses of Cash Collateral sought  
2 in this proceeding.

### 3 **EVENTS LEADING UP TO BANKRUPTCY FILING**

4 6. As mentioned, Debtor's affiliate, Creative, runs an operating business that sells,  
5 leases and operates water machines throughout the United States.  
6

### 7 **Initiation of Receivership**

8 7. First Fed Bank, a secured creditor, sought the appointment of a general receiver  
9 over Debtor's assets and business in King County Superior Court.

10 8. On May 3, 2024, the King County Superior Court appointed Turning Point  
11 Strategic Advisors as general receiver over the assets and business of Debtor ("Turning Point" or  
12 "Receiver"). In that order, the court found, among other things, that Debtor was in default on  
13 certain loan obligations owed to First Fed Bank, that Debtor lacked the ability and resources to  
14 protect and preserve its assets, and that Debtor was not paying debts when due.  
15

16 9. The receivership estate's assets consisted primarily of the real property identified  
17 in Exhibit A and the income identified in Exhibit B.

18 10. Each of the pieces of Real Property are encumbered by one or more deeds of trust  
19 in favor of multiple lenders, and most are further encumbered by other liens, including property  
20 tax liens and contractor's liens.  
21

### 22 **Marketing and Attempted Sales in Receivership**

23 11. Marshalling the Real Property, located across the country and in various states of  
24 disrepair, requires steady organization and management. As part of this work, promptly  
25 following Receiver's appointment it reached out to national real estate brokerages to identify a  
26 "one stop shop" for marketing and selling the Real Property. Receiver negotiated a discounted

1 commission structure with NAI Puget Sound Properties, Richard Page, and NAI's affiliated  
2 brokerages across the country (collectively, "Brokers"). On May 15, 2024, the King County  
3 Superior Court approved the employment of the Brokers.

4           12. Promptly following their employment, the Brokers started working with Receiver  
5 to secure, market, and sell the Properties.  
6

7           13. While Receiver made significant progress in listing properties, receiving and  
8 evaluating offers, and signing sales contracts, Receiver ran into an intractable problem. There are  
9 at present at least two federal lawsuits, and several state lawsuits, alleging that Debtors' previous  
10 manager, Ryan Wear, engaged in a massive fraud and Ponzi scheme, and alleging that Debtors'  
11 Real Property may have been obtained using funds involved in fraud. As a result, title insurance  
12 companies were unwilling to insure receivership sales.  
13

14           14. Receiver had lengthy, detailed discussions and meetings with multiple title  
15 insurance companies across the company which ultimately, after weeks of review, declined to  
16 provide coverage. Several representatives of those companies informed Receiver that they  
17 would be willing to provide coverage if the Debtor was placed in bankruptcy, and if Debtor's  
18 assets are sold under Section 363 of the United States Bankruptcy Code.  
19

20           15. Without title insurance, Receiver would be forced to offer substantial discounts to  
21 attract buyers. The result of this would be that millions of dollars would be lost for the creditors  
22 of the receivership estate.

23           16. Receiver recently identified one title company that appeared willing to provide  
24 coverage, on a case by case basis for sales in receivership in limited circumstances, but was more  
25 willing to insure sales in bankruptcy. The timing of this remained problematic as Receiver was  
26

1 going to start facing foreclosures in other states and would not be able to sell those properties  
2 ahead of the foreclosure sales, again resulting in lost money for the creditors of Debtor.

3 **Compliance and Enforcement Issues with Prior Management**

4 17. As is typical at the outset of a receivership, Receiver asked Debtor's  
5 management—namely, Ryan Wear and Jeremy Briggs—for documents and information  
6 regarding Debtor's corporate governance structure, assets, finances, insurance and operations.  
7 Receiver requested documents related to the Real Property; to identify and transfer control of  
8 deposit accounts; deliver keys or access codes for facilities; information regarding lease  
9 agreements and payment streams; and share the information they had purportedly given to  
10 prospective buyers. Receiver tried to schedule meetings to obtain keys, building access codes,  
11 and deposit account access.  
12

13 18. Though Mr. Wear and Mr. Briggs were originally cordial and amenable, they did  
14 not actually provide many records or work cooperatively to go to banks or meet to hand over  
15 keys (in many instances claiming they did not have the keys or know where the keys may be).  
16 Because informal requests seemed ineffective, Receiver scheduled a meeting to work through the  
17 list of things outstanding. Receiver expected them to attend the meeting prepared to provide the  
18 information requested, such as sharing access to QuickBooks for Debtor.  
19

20 19. I personally met with Mr. Wear and Mr. Briggs on May 21, 2024, along with one  
21 of my colleagues from Turning Point. To our surprise and disappointment, Mr. Briggs showed  
22 up with nothing but a blank legal pad. He did not bring his laptop, so he was unable to access any  
23 online records, including QuickBooks and bank accounts during the meeting. Mr. Wear deferred  
24 to Mr. Briggs on all financial matters, and he could not recall which keys he had or where he  
25 kept them. We asked when they would be able to provide the information we were requesting.  
26

1 Mr. Briggs said he would turn to it in two or three days, after finishing a “big refinancing  
2 project.”

3 20. After some time passed, Mr. Briggs provided only (i) an incomplete rent roll and  
4 (ii) a vendor list that had not been updated since December 31, 2023.

5 21. For several weeks, Mr. Briggs allowed Receiver nothing more than “view only”  
6 access to accounts at Bank of America. “View only” access does not allow Receiver to look at  
7 more than recent transactions; it does not give access to bank statements. Without that  
8 information, Receiver could not begin a reliable accounting or track receivership assets. Mr.  
9 Wear met with Nick Howe of Turning Point at Bank of America on June 5, 2024 to make Mr.  
10 Howe a co-signor on those accounts.

11 22. Following Receiver filing a motion for contempt sanctions and follow-up  
12 communications over several weeks, Receiver finally received some of the requested information  
13 for assessment of the receivership estate.

14 **Real Property Access and Rent Payment Issues**

15 23. I have been told that Mr. Wear or Mr. Briggs instructed certain managers to tell  
16 their employees not to cooperate with the Receiver with regard to Debtor’s properties. This made  
17 accessing the Real Property more difficult as the employees on site were either uncooperative or  
18 unaware of the Receivership. These issues slowed down marketing and sales of properties. I also  
19 received emails from employees instructing me on what I could and could not talk to employees  
20 about when I was at the properties, and reprimanding me for creating confusion (since these  
21 employees were apparently not made aware of the receivership).

22 24. Many entities affiliated with Debtor have purported lease agreements for the Real  
23 Property. However, none of the affiliated entities that have leases with Debtor appear to have  
24

1 paid rent since initiation of receivership. (It also does not appear that they were paying rent  
2 before the initiation of the receivership).

3         25. I have also been told that Mr. Wear or Mr. Briggs may have instructed employees  
4 to sell assets of affiliated entities that are stored at the Real Property locations. Accordingly,  
5 Receiver has been working to secure sites with limited resources. I have received multiple  
6 emails, including an email dated today, September 9, 2024, stating that assets of affiliated  
7 entities are being sold out of these locations.  
8

9 **Receiver Evaluates Options for Federal Bankruptcy Filing**

10         26. On August 27, 2024, involuntary petitions were filed against three entities  
11 affiliated with Debtor in the Southern District of Texas Bankruptcy Court. Those entities are:  
12 Creative Technologies, LLC; Refreshing USA, LLC; and Water Station Management, LLC.  
13

14         27. Debtor is headquartered in Washington and does not appear to have significant  
15 ties to make the Southern District of Texas an appropriate venue for a Bankruptcy proceeding.

16         28. Tyler Sadek had received, as partial collateral for a loan, an assignment from  
17 Ryan Wear as to all of Mr. Wear's interests in the Debtor (which comprised ninety percent of the  
18 outstanding membership interest in the Debtor). In June 2024, Mr. Sadek completed a  
19 foreclosure as to the pledged interests in the Debtor in a state court proceeding in Indiana. Mr.  
20 Sadek now holds ninety percent of the membership interests in the Debtor previously held by  
21 Mr. Wear.  
22

23         29. As a result of the above and to protect the Debtor and its assets, Mr. Sadek  
24 executed the Corporate Resolution attached to the Petition (ECF No. 1) which appointed me as  
25 Manager of the Debtor and authorized the filing of the Debtor into a chapter 11 bankruptcy case.  
26

1 Acting as Manager of Debtor, I made the decision to file a voluntary chapter 11 petition for  
2 Debtor.

3 30. Due to the nature of its Real Property assets, Debtor has a need to pay insurance,  
4 pay utilities and pay those working for it, including its professionals. If such payments are not  
5 made, the Debtor would suffer irreparable harm through the loss or diminution in value of its  
6 assets. The Debtor is unable to obtain unsecured credit to fund its continued operations.  
7

8 I declare under penalty of perjury under the laws of the State of Washington that the  
9 foregoing statements are true and correct to the best of my knowledge.  
10

11 DATED this 9th day of September 2024, at Seattle, Washington.

12  
13 /s/ Eric Camm  
14 Eric Camm  
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26



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12  
13   
14 Eric Camm

## **Exhibit A**

<u>NAME OF PROPERTY</u>	<u>ADDRESS</u>	<u>DATE OF PURCHASE</u>	<u>TITLE ENTITY</u>	<u>VALUE AT PURCHASE</u>	<u>1st MORTGAGE Amt. (est. as of May 2024 )</u>	<u>1st LENDER</u>	<u>2d LENDER</u>	<u>EST. VALUE/SALE PRICE</u>	<u>Listed for Sale Status</u>	<u>Property Type Summary</u>
ARIZONA 4237 E MAGNOLIA	4237 E MAGNOLIA PHOENIX ARIZONA	2020	IDEAL PROPERTY INVESTMENTS LLC	\$ 1,050,000	\$ 737,500	First Security Bank	FIRST FED BANK	\$ 3,900,000	Yes	Industrial/retail/fl ex 6 tenants, 10
ARIZONA MANUFACTURING	1930 N 22ND AVE PHOENIX AZ 85009	12/2/2021	IDEAL PROPERTY INVESTMENTS LLC	\$ 5,450,000	\$ 4,087,500	FSBNV	FIRST FED BANK	\$ 975,000		Industrial/Wareh ouse
YUMA ARIZONA	653 E 20TH STREET YUMA AZ 85365	12/15/2021	IDEAL PROPERTY INVESTMENTS LLC	\$ 1,500,000	\$ 1,050,000	Candence Bank	FIRST FED BANK	\$ 9,500,000	Yes	Warehouse/indus trial
ARIZONA ICE/WATER	700 S. ARIZONA BLVD COOLIDGE AZ 85128	9/16/2021	IDEAL PROPERTY INVESTMENTS LLC	\$ 120,000	\$ -	FIRST FED BANK		\$ 4,900,000	Yes	Industrial
HAYWARD	25377 HUNTWOOD AVENUE HAYWARD CA 94544	9/14/2021	IDEAL PROPERTY INVESTMENTS LLC	\$ 8,400,000	\$ 3,850,000	Socotra Capital	FIRST FED BANK			County site says, Storage building built 1970.
ESCONDIDO	530 OPPER STREET ESCONDIDO, CA	8/2/2021	IDEAL PROPERTY INVESTMENTS LLC	\$ 4,797,456	\$ 3,850,000	Socotra Capital	FIRST FED BANK	\$ 6,960,000.00	Yes	RV and Boat Storage 14919 & 14821 vacant land 14805 is a SFR
TALLAHASSEE	877 ORANGE AVE TALLAHASSEE FL	7/7/2021	IDEAL PROPERTY INVESTMENTS LLC	\$ 330,000	\$ -	FIRST FED BANK		\$ 4,100,000		Industrial
COMMERCIAL BLDG IL	8460 THOMAS AVENUE BRIDGEVIEW, IL 60455	1/13/2022	IDEAL PROPERTY INVESTMENTS LLC	\$ 500,000	\$ -	FIRST FED BANK		\$ 599,000		warehouse
MISSOULA	1924 NORTH AVE W, MISSOULA, MT 59801		IDEAL PROPERTY INVESTMENTS LLC					\$ 691,200.00		warehouse
VEGAS	7925 W ARBY AVE LAS VEGAS NV, 89113	2020	IDEAL PROPERTY INVESTMENTS LLC	\$ 3,854,045	\$ 3,090,000	FSBNV	FIRST FED BANK	\$ 850,000		Warehouse
PORTLAND	19355 SW TETON AVENUE TUALATIN OREGON	1/21/2021	IDEAL PROPERTY INVESTMENTS LLC	\$ 2,735,000	\$ 1,430,352	FIRST FED BANK		\$ 525,000		Industrial/Wareh ouse
DALLAS	2709 ELECTRONIC LANE DALLAS TEXAS 75220	8/31/2022	IDEAL PROPERTY INVESTMENTS LLC	\$ 4,560,000	\$ 3,420,000	BANCORP SOUTH	FIRST FED BANK			
630 VEREDA	630 Vereda, San Antonio, TX 78201		IDEAL PROPERTY INVESTMENTS LLC					\$ 180,900.00		Warehouse/ light industrial
4407 SUN VISTA	4407 Sun Vista Ln, San Antonio, TX 78217		IDEAL PROPERTY INVESTMENTS LLC					\$ 230,700.00		residential

UTAH	586 WEST 9320 SOUTH, SANDY, UT		IDEAL PROPERTY INVESTMENTS LLC							\$ 2,789,328.00		retail
STANWOOD-JOHN BERRY	27423 40TH AVE STANWOOD WA	2020	IDEAL PROPERTY INVESTMENTS LLC	\$	775,000	\$	550,000	AVATAR/NBC Mergeco Inc.	FIRST FED BANK	\$ 1,500,000	Yes	Industrial
12 EMERY	12 Emery Rd, Oroville, WA 98844	4/28/2021	IDEAL PROPERTY INVESTMENTS LLC	\$	215,000	\$	-	FIRST FED BANK		\$ 6,125,000	Yes	Warehouse
EVERETT	11410 BEVERLY PARK RD EVERETT WA 98204	9/9/2021	IDEAL PROPERTY INVESTMENTS LLC	\$	6,225,000	\$	4,223,810	FIRST FED BANK		\$ 900,000		Industrial/Wareh ouse
ARLINGTON AIRPORT	3811 188TH STREET NE ARLINGTON WA	2019	IDEAL PROPERTY INVESTMENTS LLC	\$	995,000	\$	695,000	FIRST FED BANK		\$ 2,800,000	Yes	Industrial
STANWOOD	27602 40th Ave NW, Stanwood, WA	2020	IDEAL PROPERTY INVESTMENTS LLC	\$	775,000	\$	550,000	NBC Mergeco, Inc	FIRST FED BANK	\$ 4,750,000		Industrial
CAMANO	3200 SHORELINE DR CAMANO ISLAND WA	2020	IDEAL PROPERTY INVESTMENTS LLC	\$	830,000	\$	500,000	NBC Mergeco, Inc	FIRST FED BANK	\$ 175,000		Land with pole structure
MARYSVILLE	14925 35th Ave NE, Marysville, WA 98271	2019	IDEAL INDUSTRIAL PARK LLC (FORMERLY IDEAL PROPERTY INVESTMENTS LLC)	\$	1,350,000	\$	950,000	Seller/Everett 1 LLC	FIRST FED BANK	\$ 900,000		SFR 1-4
8825 KENT	8825 S 228TH ST KENT WA 98031	5/25/2021	8825 LLC	\$	5,250,000	\$	2,903,352	FIRST FED BANK		\$ 2,950,000		Warehouse with 2 offices
GEORGIA BUILDING (COLUMBUS)	1118 Virginia St, Columbus, GA	2020	1118 VIRGINIA STREET LLC	\$	500,000	\$	318,000	PINNACLE	FIRST FED BANK	\$ 775,000		SFR 1-4
NORTH CAROLINA	701 EDEN TERRACE ARCHDALE NC 27263	2019	701 EDEN LLC	\$	845,000	\$	640,000	PINNACLE BANK	FIRST FED BANK	\$ 775,000		Vacant land
FORT MYERS	2129 ANDREA LANE FORT MYERS FL 33912	2020	2129 ANDREA LANE LLC	\$	2,235,000	\$	1,735,000	STRONGHILL CAPITAL, LLC & SBA		\$ 1,000,000	Yes	Vacant land
LONGVIEW TEXAS	343 JOHNNY CLARK ROAD LONGVIEW TEXAS 75605	2020	343 JOHNNY CLARK LLC	\$	830,000	\$	600,000	FIRST FED BANK		\$ 650,000		Warehouse
ARIZONA 4035 E MAGNOLIA	4035 East Magnolia St. Phoenix, AZ		3422 W CLARENDON LLC							\$ 937,500		commercial
4827 STANWOOD	4827 268TH ST NW, STANWOOD, WA 98292		3422 W CLARENDON LLC							\$ 545,000.00		residential
SMOKEY POINT BLVD	14418 SMOKEY PT BLVD., MARSYVILLE, WA 98270		3422 W CLARENDON LLC							\$ 500,050.00		commercial
HOUSTON	11519 SOUTH PETROPARK AVENUE HOUSTON TX	2020	11519 SOUTH PETROPARK LLC	\$	915,000	\$	650,000	AM FIRST NATIONAL HOUSTON	FIRST FED BANK	\$ 100,000		Vacant land
SMOKEY POINT HOLDINGS LLC	3740 152ND ST NE, MARYSVILLE, WA 98271		SMOKEY POINT HOLDINGS LLC							\$ 1,614,900.00		land

SMOKEY POINT	14919, 14821 Smokey Point BLVD, Marysville, WA 98271, 14805 35th Ave NE, Marysville, WA 98270	7/11/1905	SMOKEY POINT HOLDINGS LLC	\$	5,000,000.00	\$	1,690,000.00	NBC Mergeco, Inc	FIRST FED BANK (as to 5 of 6 parcels)	\$ 7,470,000.00	Yes	Warehouse/industrial
MURFREESBORO	730 MIDDLE TENN BLVD MURFREESBORO TN 37129	3/17/2022	IDEAL MURFREESBORO	\$	3,660,000	\$	3,123,426	AVATAR	FIRST FED BANK	\$ 5,800,000	Yes	Warehouse
GREENLEAF	1400 GREENLEAF AVE ELK GROVE VILLAGE, IL 60007	3/1/2022	IDEAL GREENLEAF LLC	\$	4,425,000	\$	3,000,000	Avatar REIT I LLC	FIRST FED BANK	\$ 1,250,000	Yes	Industrial

## **Exhibit B**

Property Name	Address	City	Zip	State	ENTITY OWNER / LANDLORD	Tenant Type	Tenant	Cost Per Month
GEORGIA BUILDING (COLUMBUS)	1118 Virginia St, Columbus, GA				1118 VIRGINIA STREET LLC	Related Party	Refreshing GA	
HOUSTON	11519 SOUTH PETROPARK AVENUE HOUSTON TX				11519 SOUTH PETROPARK LLC	Related Party	Refreshing TX	
FORT MYERS	2129 ANDREA LANE FORT MYERS FL 33912				2129 ANDREA LANE LLC	Related Party	Refreshing FL	
FORT MYERS	2129 ANDREA LANE FORT MYERS FL 33912				2129 ANDREA LANE LLC	3rd Party	Condo Cars	
FORT MYERS	2129 ANDREA LANE FORT MYERS FL 33912				2129 ANDREA LANE LLC	3rd Party	Beaches Interior LLC	
LONGVIEW TEXAS	343 JOHNNY CLARK ROAD LONGVIEW TEXAS 75605				343 JOHNNY CLARK LLC	Related Party	Refreshing TX	
NORTH CAROLINA	701 EDEN TERRACE	ARCHDALE	27263	NC	701 EDEN AVE LLC	3rd Party	BUREAU OFFICE INC.	\$ 10,625
NORTH CAROLINA	701 EDEN TERRACE ARCHDALE NC 27263				701 EDEN LLC	Related Party	Refreshing USA	
CHICAGO 1400 GREENLEAF	1400 GREENLEAF AVE ELK GROVE VILLAGE, IL 60007				IDEAL GREENLEAF LLC	Related Party	Refreshing GL	
ARIZONA 4237 E MAGNOLIA	4237 E MAGNOLIA PHOENIX ARIZONA				IDEAL PROPERTY INVESTMENTS LLC	Related Party	Refreshing AZ	
ARIZONA ICE/WATER	700 S. Arizona Blvd.	Coolidge	85128	AZ	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Ice & Water Vendors	\$ -
ARIZONA MANUFACTURING	1930 N 22nd Ave.	Phoenix	85009	AZ	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Grand Canyon Foods International	\$ 15,225
ARIZONA MANUFACTURING	1930 N 22nd Ave.	Phoenix	85009	AZ	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Mach Holdings	\$ -
COMMERCIAL BLDG IL	8460 THOMAS AVENUE BRIDGEVIEW, IL 60455				IDEAL PROPERTY INVESTMENTS LLC	Related Party	Refreshing GL	
DALLAS	2711 Electronic Lane	Dallas	75220	TX	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Select Technolgy Group	\$ 3,002
DALLAS	2715 Electronic Lane	Dallas	75220	TX	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Dobbs Stanford Corp.	\$ 11,097
DALLAS	2709 ELECTRONIC LANE DALLAS TEXAS 75220				IDEAL PROPERTY INVESTMENTS LLC	Related Party	Refreshing TX	
EVERETT	11411 Beverly Park Rd.	Everett	98205	WA	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Arlington Recycle	\$ 10,000
EVERETT	11410 BEVERLY PARK RD EVERETT WA 98204				IDEAL PROPERTY INVESTMENTS LLC	Related Party	Refreshing USA	
HAYWARD	25377 Huntwood Ave.	Hayward	94544	CA	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	ITA Med Co	\$ 17,000
NASHVILLE	730a Middle Tennessee Blvd,Suite 9	Murfreesboro	37129	TN	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Receumbent Bicycles of Tennessee	\$ 1,292
NASHVILLE	730a Middle Tennessee Blvd,Suite 10 and 11	Murfreesboro	37129	TN	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Tenn 730 Business LLC	\$ 4,667
NASHVILLE	730a Middle Tennessee Blvd,Suite 12	Murfreesboro	37129	TN	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Guardian MMA, LLC	\$ 4,851
NASHVILLE	730a Middle Tennessee Blvd,Suite 13	Murfreesboro	37129	TN	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Hexa Partners	\$ 4,118
NASHVILLE	730a Middle Tennessee Blvd,Suite 14-15	Murfreesboro	37129	TN	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	The Warehouse	\$ 3,219
NASHVILLE	730a Middle Tennessee Blvd,Suites 18-20	Murfreesboro	37129	TN	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Oerlikon Balzers Coating USA, Inc.	\$ 6,888
PORTLAND	19355 SW TETON AVENUE TUALATIN OREGON				IDEAL PROPERTY INVESTMENTS LLC	Related Party	Refreshing MW	
TALLAHASSEE	877 ORANGE AVE TALLAHASSEE FL				IDEAL PROPERTY INVESTMENTS LLC	Related Party	Refreshing FL	
VEGAS	7925 W ARBY AVE LAS VEGAS NV, 89113				IDEAL PROPERTY INVESTMENTS LLC	Related Party	Refreshing NV	
YUMA ARIZONA	653 E 20th St. Suite A	Yuma	85365	AZ	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Yuma Gymnastics	\$ 2,808
YUMA ARIZONA	653 E 20TH STREET YUMA AZ 85365				IDEAL PROPERTY INVESTMENTS LLC	Related Party	Refreshing AZ	
SAN DIEGO	530 Opper St., Unit B Mauricio Rosas 916-953-3663	Escondido	92029	CA	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Progressive Design Playgrounds	\$ 4,725
SAN DIEGO	530 Opper St., Unit A	Escondido	92029	CA	IDEAL PROPERTY INVESTMENTS LLC	3rd Party	Sound-Crete / Cell-Crete Corp.	\$ 6,327
MISSOULA	Unknown				Unconfirmed	3rd Party	Customm Upholstery - Missoula MT	
PORTLAND	19355 SW TETON AVENUE TUALATIN OREGON				Unconfirmed	3rd Party	Sky Heating and Air Conditioning - Tualitin OR	
PORTLAND	19355 SW TETON AVENUE TUALATIN OREGON				Unconfirmed	3rd Party	Sherwood Collision Center	

## **Exhibit C**



Ideal Property Investments LLC	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast
Forecasted Cash Flow	9/6/2024	9/13/2024	9/20/2024	9/27/2024	10/4/2024	10/11/2024
	1	2	3	4	5	6

Northwest Bank *3000	54,230					
<b>Beginning Bank Balance</b>	54,230	85,785	85,785	132,131	(0)	32,482

<u>Income</u>	9/6/2024	9/13/2024	9/20/2024	9/27/2024	10/4/2024	10/11/2024	Total
Rental Property Income	\$ 33,145	\$ -	\$ 46,346	\$ -	\$ 33,145	\$ -	\$ 112,636
Property Disposition (net)	-	-	-	-	-	-	\$ -
<b>Income Inflow</b>	<b>\$ 33,145</b>	<b>\$ -</b>	<b>\$ 46,346</b>	<b>\$ -</b>	<b>\$ 33,145</b>	<b>\$ -</b>	<b>\$ 112,636</b>

<u>Operating Expenses</u>							
Adequate Protection Payments	-	-	-	36,299	-	-	\$ 36,299
Property Insurance	-	-	-	58,583	-	-	\$ 58,583
Professional Fee Holdback	-	-	-	15,000	-	-	\$ 15,000
Turnover Cost - Section 503(b)3	-	-	-	10,000	-	-	
Manager Compensation	-	-	-	12,000	-	-	
US Trustee Fees	-	-	-	250	-	-	
Rental Utilities	1,590	-	-	-	663	-	\$ 2,253
<b>Operational Outflow</b>	<b>\$ 1,590</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 132,132</b>	<b>\$ 663</b>	<b>\$ -</b>	<b>\$ 134,384</b>
<b>Total Cashflow</b>	<b>\$ 31,555</b>	<b>\$ -</b>	<b>\$ 46,346</b>	<b>\$ (132,132)</b>	<b>\$ 32,482</b>	<b>\$ -</b>	

<b>Ending Bank Balance</b>	<b>\$ 85,785</b>	<b>\$ 85,785</b>	<b>\$ 132,131</b>	<b>\$ (0)</b>	<b>\$ 32,482</b>	<b>\$ 32,482</b>
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